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16 Attorney for Defendants ANTHONY BUCHER, GRACIE PRODUCTIONS, and
17 SEVEN13 MUSIC & ENTERTAINMENT

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

HELEN NADEL, et al;

Case No.: 8:17-CV-00355-SS

Plaintiffs,

v.

ANTHONY BUCHER, et al;

JOINT STIPULATION OF
VOLUNTARY DISMISSAL
WITHOUT PREJUDICE;
REQUEST FOR THIS COURT TO
RETAIN JURISDICTION; AND
[PROPOSED] ORDER

Defendants.

1. Pursuant to Federal Rule of Civil Procedure 41(a)(2), Plaintiffs HELEN
NADEL and SOUND PLUS LLC ("Plaintiffs") and Defendants ANTHONY

1 BUCHER, GRACIE PRODUCTIONS, and SEVEN13 MUSIC &
2 ENTERTAINMENT (“Bucher Defendants”) hereby file this joint stipulation.
3

4 2. Plaintiffs and Bucher Defendants have entered into a confidential settlement
5 agreement, dated September 10, 2018, and fully executed on October 5, 2018,

6 3. Under the terms of the settlement agreement, the Parties are to perform
7 certain acts over an agreed period of time.

8 4. The settlement agreement requires Plaintiffs to voluntarily dismiss without
9 prejudice all claims against all defendants subject to this Court retaining
10 jurisdiction over the action in order to enforce the settlement agreement.

11 5. Whereas, the Parties hereby request that this Court shall retain jurisdiction to
12 the above action in order to enforce the terms of the Settlement Agreement
13 pursuant to Court’s entry of the attached order.

14 6. Upon full performance of the matters required under the settlement
15 agreement (which is scheduled to occur on or before August 1, 2021), the Parties
16 shall voluntarily dismiss with prejudice all claims against all defendants pursuant
17 to Federal Rule of Civil Procedure 41(a)(1)(ii).

18 7. This dismissal pursuant to Fed. R. Civ. P. 41(a)(2) is without an award of
19 attorney’s fees, interest, or costs to any Party, as each side shall bear their own
20 attorney’s fees and costs.

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1 NOW, THEREFORE, by and through their respective counsel of record, the
2 Parties hereby stipulate and agree, subject to approval by the Court, that the above-
3 captioned action should be dismissed without prejudice as to Defendants.
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5 IT IS SO STIPULATED.
6

7 DATED: October 31, 2018

THE FRIED FIRM PLLC
ALLEN KRONENBERGER
555 West 5th Street, Suite 34011
Los Angeles, CA 90013

10 By: /s/Allen Kronenberger II, Esq.
11 Allen Kronenberger #297194
12 Attorney for Plaintiffs

13 DATED: October 31, 2018

14 EHLERS LAW CORPORATION
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16 2600 Capitol Avenue, Suite 300
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18 By: /s/Wesley C.J. Ehlers Esq.
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